

EXHIBIT 3

STATE OF MINNESOTA

COUNTY OF RAMSEY

DISTRICT COURT

SECOND JUDICIAL DISTRICT
FAMILY COURT
CASE TYPE: Family Other

-----X

LINDSEY MIDDLECAMP,

Petitioner,

-- against --

Court File No.: 62-HR-CV-17-233

BROCK FREDIN,

Respondent.

-----X

RESPONDENT BROCK FREDIN'S FIRST SET OF REQUESTS FOR ADMISSIONS

Pursuant to Rule 36 of the Minnesota Rules of Civil Procedure, please answer the following Requests for Admission by admitting or denying the Request within thirty (30) days of service. The matter is admitted unless within thirty (30) days after service of the Request the party to whom the Request is directed serves upon the party requesting the admission a written answer or objection addressed to the matter, signed by the party or the party's attorney. If objection is made, the reasons therefore shall be stated. The answer shall specifically deny the matter or set forth in detail the reasons why the answering party cannot truthfully admit or deny the matter. A denial shall fairly meet the substance of the requested admission, and, when good faith requires that a party qualify an answer or deny only a party of the matter of which an admission is requested, the party shall specify so much of it as is true and qualify or deny the remainder. An answering party may not give lack of information or knowledge as a reason for failure to admit or deny unless the party states that a reasonable inquiry has been made and that the information known or readily obtainable by the party is insufficient to enable the party to admit or deny.

REQUESTS FOR ADMISSIONS

1. Admit that at the time of filing of the above-captioned action, Petitioner Lindsey Middlecamp was a resident of Hennepin County Minnesota.
2. Admit that Petitioner Lindsey Middlecamp operates the @CardsAgstHrsmt Twitter account.
3. Admit that Petitioner Lindsey Middlecamp posts on the Internet using the @CardsAgstHrsmt Twitter account.
4. Admit that the document attached hereto as Exhibit 1 is a true and accurate copy of Petitioner's January 24, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.
5. Admit that the document attached hereto as Exhibit 2 is a true and accurate copy of Petitioner's January 24, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.
6. Admit that the document attached hereto as Exhibit 3 is a true and accurate copy of Petitioner's February 1, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.
7. Admit that the document attached hereto as Exhibit 4 is a true and accurate copy of Petitioner's February 1, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.
8. Admit that the document attached hereto as Exhibit 5 is a true and accurate copy of Petitioner's February 1, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.

9. Admit that the document attached hereto as Exhibit 6 is a true and accurate copy of Petitioner's February 1, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.

10. Admit that the document attached hereto as Exhibit 7 is a true and accurate copy of Petitioner's February 3, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.

11. Admit that the document attached hereto as Exhibit 8 is a true and accurate copy of Petitioner's February 6, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.

12. Admit that the document attached hereto as Exhibit 9 is a true and accurate copy of Petitioner's February 6, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.

13. Admit that the document attached hereto as Exhibit 10 is a true and accurate copy of Petitioner's February 22, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.

14. Admit that the document attached hereto as Exhibit 12 is a true and accurate copy of Petitioner's February 22, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.

15. Admit that the document attached hereto as Exhibit 12 is a true and accurate copy of Petitioner's February 23, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.

16. Admit that the document attached hereto as Exhibit 14 is a true and accurate copy of Petitioner's March 1, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.

17. Admit that the document attached hereto as Exhibit 15 is a true and accurate copy of Petitioner's March 1, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.

18. Admit that the document attached hereto as Exhibit 16 is a true and accurate copy of Petitioner's March 6, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.

19. Admit that the document attached hereto as Exhibit 17 is a true and accurate copy of Petitioner's March 21, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.

20. Admit that the document attached hereto as Exhibit 18 is a true and accurate copy of Petitioner's April 5, 2017 tweet from the @CardsAgstHrsmt Twitter account concerning Respondent.

Dated: July 13, 2017
Hudson, WI

/s/ Brock Fredin

Brock Fredin
1905 Iris Bay
Hudson, WI 54016
(415) 283-8366 (tel.)
brockf12@gmail.com
Respondent, Pro Se

TO: Michael Boulette
Messerli & Kramer
1400 Fifth Street Towers
100 South Fifth Street
Minneapolis, MN 55402-1217
Counsel for Petitioner
Lindsey Middlecamp

EXHIBIT 1

**CardsAgstHarassment**

@CardsAgstHrsmt

[Follow](#)

▼

Women of MN: this is Brock Fredin, aka Dan/Will. He has at least two restraining orders against him. Please RT to help keep women safe.



PaperTreadmill
32 • Saint Paul, MN • 0% Match



GopherBadge
32 • Minneapolis, MN

9:11 AM - 24 Jan 2017

731 Retweets 321 Likes

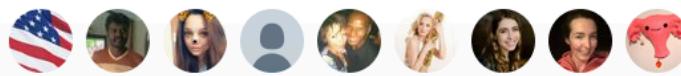


EXHIBIT 2



CardsAgstHarassment @CardsAgstHrsmt · Jan 24

Replies to [@CardsAgstHrsmt](#)

Thanks for the shares. Men who don't respect women's boundaries walk among us every day; rare for it to be documented enough to warn others.



Reply 9



64



EXHIBIT 3

CardsAgstHarassment @CardsAgstHrsmt · Feb 1

Replying to [@CardsAgstHrsmt](#)

Tip: if you are described as potentially predatory, perhaps sending emails like this is not the best way to establish how not scary you are:

Date: Wed, Feb 1, 2017 at 5:21 AM
Subject: Ethics Concern
To: [REDACTED]

You wrote an article about 'shirtless shaming' in Minneapolis. That person/account recently did 'victim shamming' someone who was the target of revenge porn.

There is a criminal investigation underway in St. Paul. We know the stalker is named [REDACTED]

We'd like to know if you know Lindsay's name from the Cards Against Harassment account. We can share any information about the criminal investigation into their stalking and criminal defamation.

They released a victim's work information publicly and created online sex profiles/ads soliciting sex without consent that sent many emails to the victim. This is against the law.

If you stand for gender equality, justice, etc... You'll help to get Lindsay's name. Give it to [REDACTED] Police Dept. Very valuable to prevent revenge porn.

We need it immediately.

We will peacefully protest the Huffington Post for endorsing revenge porn if you don't cooperate.

17 47 112



EXHIBIT 4

My longer-winded way of saying "Not today, Brock Fredin. Not tomorrow, either."



Re: Ethics Concern

Mr. Fredin,

As you know, I maintain a twitter account that primarily addresses subjects of online and real life misogyny, harassment, rape culture, etc. Although I am not a journalist or a public figure, I endeavor to use my personal social media platform to raise awareness on matters related to gendered violence, equality, and social justice.

Today I was forwarded an email you sent to the Huffington Post which, although somewhat difficult to follow, appears to accuse me of participating in criminal activities. I believe you are well aware that these allegations are false. After reading the Minnesota Court of Appeals decision upholding a restraining order against you, I posted a tweet on January 24 sharing your name with my followers. Beyond that, I have not generated, posted, published, or distributed any content related to you (other than a subsequent tweet posted today publishing a screenshot of your email to the Huffington Post.) Given the complete falseness and lack of support for your allegations of criminal conduct I can only conclude that you sent the email to the Huffington Post for the purpose of harassment or harm to my reputation.

I expect that you will immediately cease and desist any direct contact to myself or indirect contact made to third parties with the purpose of either a) making knowingly false allegations against me or b) finding my personal information (which by extension, seems designed to send the message to me that you are looking for my personal information, which I believe any reasonable person would view as carrying threatening connotations since we have never met and my sole contact related to you has been a tweet containing only factual information.)

In light of the documented history of harassing tactics you have engaged in against other local women I will take any necessary legal steps to protect

EXHIBIT 5



CardsAgstHarassment @CardsAgstHrsmt · Feb 1

To those who RT or reply to this thread: my DMs are open. Please let me know if he targets you, your family, your employer, etc. Stay safe.

6

6

64

1 more reply



...

EXHIBIT 6

CardsAgstHarassment @CardsAgstHrsmt · Feb 1

Replying to @CardsAgstHrsmt

Folks: a person WHO DOES NOT EVEN FOLLOW ME liked the tweet re Brock
Fordin, so he sent this email about her to retaliate. This is... a lot.

Date: Wed, Feb 1, 2017 at 4:59 PM

Subject: Ethics Concern

To:

She recently participated in a Twitter campaign shamming a victim of revenge porn. This campaign also released the victim's work information publicly to 20k viewers of the post.

We are asking you to immediately end any relationship with her.

If you do not endorse stalking or revenge porn, we ask that you end any future relationship, and remove any of her content/association from your site.

I'd also like to connect with a reporter about an ongoing campaign that's related to a digital 'reverse brock turner' type of tactic. We have a criminal investigation with the St. Paul Police Dept.

7 17 41



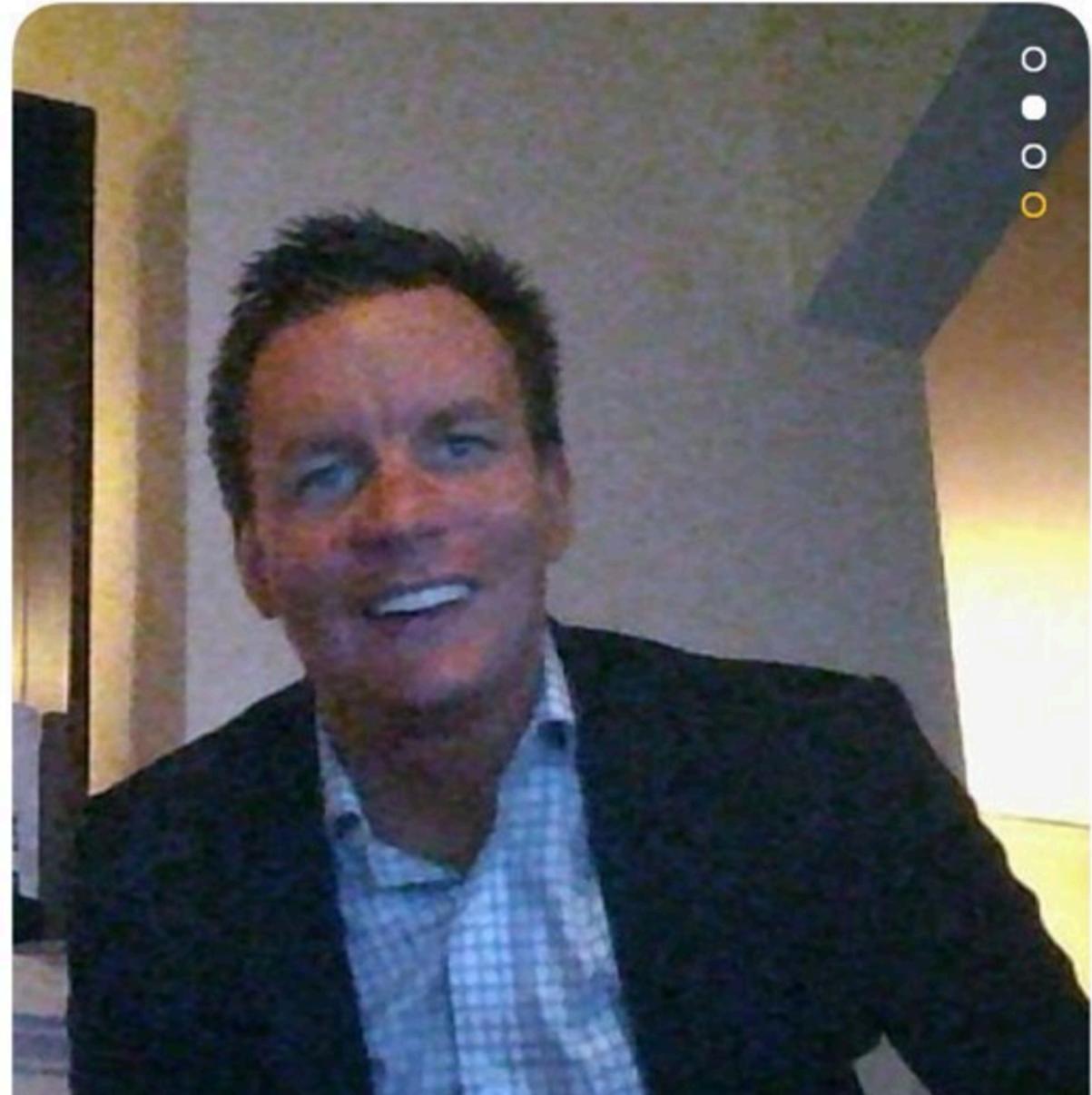
EXHIBIT 7



CardsAgstHarassment @CardsAgstHrsmt · Feb 3

Replies to [@CardsAgstHrsmt](#)

Update: alias "Felix" on Bumble. Please share if you have friends using dating apps/sites in the Twin Cities & DM if you've been victimized.



2

91

53

EXHIBIT 8



CardsAgstHarassment @CardsAgstHrsmt · Feb 6
The stories I am hearing about this man confirm that @bumble_app, @Match,

@okcupid, @Tinder etc. *need* to require identity verification.

3 11 60



EXHIBIT 9



CardsAgstHarassment @CardsAgstHrsmt · Feb 6

Regular programming to resume for the most part but I just...oof. I cannot stand knowing these people are in my community targeting women.

1 reply 1 retweet 33 likes



EXHIBIT 10



CardsAgstHarassment @CardsAgstHrsmt · Feb 22

Replies to [@CardsAgstHrsmt](#)

Thank you, [@citypages](#), for helping shed light on this. Hoping other women living in fear realize they aren't alone.



Accused Minneapolis-St. Paul stalker Brock Fredin ...

He'd found two victims. Until they found each other.

[citypages.com](#)

1 reply 44 retweets 65 likes

EXHIBIT 11



CardsAgstHarassment @CardsAgstHrsmt . Feb 22

(Shared with permission). Apparently this man is a student of the "teach me about feminism!" school of disingenuous conversation starters:

Are you a feminist? If so, can you teach me about that?

Oh lord.

GopherBadge Yesterday – 12:12pm

I would love to learn! Please?

I am incredulous about this conversation.

GopherBadge Today – 6:27pm

It's hard for a man. Women want real men. But, don't like to make decisions either. I'm not trying to be offensive towards you or feminism. I just don't know how to balance these two conflicting theories. Your thoughts?

That's what I don't understand about feminism. I think people are people. Maybe we shouldn't advocate for one gender over another?

GopherBadge Today – 8:25am

Well, I'd love to see you do standup. I assume feminism means women in charge? But, women don't like that. Yet complain when men take control. I think being a feminist sounds hot. That sassy little attitude is always so cute.

Today – 4:45am

Hey man. Read a book. They are pretty simple to find. You find them in bookstores and libraries mostly.

People have already answered all of your questions and laid them out for you.

So like, stop bothering women online and do your own damn research about feminism.

Just now

GopherBadge Why don't we go on a date?

Nah.

Just now

Reply

6 ♠ 42 ♦ 84

EXHIBIT 12

CardsAgstHarassment @CardsAgstHrsmt · Feb 22

The power of sharing. Within hours of the stalking post going up, a rape survivor comes forward. He remains free. (Shared w/ her permission)

8 mins ·

<http://www.citypages.com/.../accused-stalker-brock-.../414395703>

I've been debating whether or not to post this, but I feel I must. This man raped me 7 years ago. The St. Louis Park police didn't take me seriously then, but I hope they will see now that he is a predator. As I type these words, my hands are shaking, my breath is short, and I have a deep, pulsing ball in the pit of my stomach. This is the physical manifestation of the PTSD I have as a result of him violating my body and robbing me of my dignity. I resent the fact that the police let my case drop. It would have spared his future victims from the heartache and trauma they are most certainly enduring now.



EXHIBIT 13

CardsAgainstHarassment @CardsAgstHrsmt · Feb 23

A direct statement shared with me by one of Brock Fredin's victims on some of the details absent from the City Pages article:

As the article describes, I requested a harassment restraining order after multiple instances of unwanted contact. I threatened to call the police twice before even seeking the order, so the unwanted contact was well over the line.

One day, not long after I'd submitted the request, a policeman came to my door to deliver a document – it was a copy of a 24-page order for protection request (which is for victims of domestic abuse) Brock had made against me. Reading through it was one of the worst moments of my life.

Despite the fact that I never harassed, harmed, or threatened to harm Brock, in the request, Brock had checked the boxes saying "I am reasonably in fear of physical harm from the respondent" and that "The respondent engaged in acts of harassment or stalking." He described me as having extreme alcoholic and violent tendencies, and threatening to kill several people. In the request, he took the liberty of diagnosing me with multiple mental health issues, including PTSD, and requesting that the court prohibit me from owning a firearm (I own a handgun – one of the few things that helped me feel safe throughout this ordeal).

He also asked the court that I be ordered to attend a domestic abuse program, to get an alcohol/chemical dependency evaluation, and be forced into mental health treatment. Finally, he requested that the court order me to pay him exactly \$2201 for his trouble. His request was denied, but Brock had the opportunity to make his case at our court hearing.

Brock must not have been that afraid of me, because in the hearing, he told the judge that he would withdraw this order for protection request if I withdrew my harassment restraining order request. Clearly this was an effort to silence me. Though I didn't back down from seeking the restraining order (which was granted), I stayed silent as he smeared my reputation on the internet and wrote open letters to me from social media accounts for months (sometimes saying he loves me, sometimes calling me a bully, or worse). I'm so glad this is in the open now. I don't know if there will ever be justice for what happened to me and to Catherine and so many others. Throughout this totally horrific episode, I keep getting told that much of his behavior is either legal or almost impossible to prove in court. But at least this way other women will be warned – and I hope that it will encourage them to seek justice, or at least protection, whatever the obstacles.

Q 5 ↑ 14 ⚖ 31



EXHIBIT 14

CardsAgstHarassment @CardsAgstHrsmt · Mar 1

I'm not going to amplify his distorted views but I want to be clear: I am not friends with, let alone related to, Brock Fredin's victims.



1 17

EXHIBIT 15

**CardsAgstHarassment** @CardsAgstHrsmt · Mar 1

I use this twitter account to discuss feminism, gender violence, etc. I do not need to be connected to victims to believe & support them.

1 3 51

**CardsAgstHarassment** @CardsAgstHrsmt · Mar 1

My anonymity should not be used as an excuse to target or blame random people who have nothing to do with my tweets but are easier to find.

1 3 25

**CardsAgstHarassment** @CardsAgstHrsmt · Mar 1

Here is what we should all expect of perpetrators who find themselves backed into a corner facing public accountability like Brock Fredin:

1 2 12

**CardsAgstHarassment** @CardsAgstHrsmt · Mar 1

1. Take stock. Do not contact any of your victims to apologize or ask for forgiveness, but tell the authorities their names & what you did.

1 2 20

**CardsAgstHarassment** @CardsAgstHrsmt · Mar 1

This includes each & every woman who has had to ask you more than once to cease contact. Not just the 2 who took legal action. It's a list.

1 2 15

**CardsAgstHarassment** @CardsAgstHrsmt · Mar 1

Every person you contacted from new numbers or accounts to avoid being ignored is a victim whose info you should give to the police.

1 2 13

**CardsAgstHarassment** @CardsAgstHrsmt · Mar 1

2. Stop blaming other people for spreading word about your behavior. Stop trying to retaliate against the people you blame. Be accountable.

1 3 22



CardsAgstHarassment @CardsAgstHrsmt · Mar 1

3. Offer a plea deal that takes accountability for the scope of people you've hurt & plans a path forward.

⌚ 1 ⏪ 2 ⌚ 13



CardsAgstHarassment @CardsAgstHrsmt · Mar 1

Because let's be real: multiple people have come forward describing stalking, harassment, and now, rape. This is not a misunderstanding.

⌚ 1 ⏪ 3 ⌚ 30



EXHIBIT 16

CardsAgstHarassment
@CardsAgstHrsm



Follow

In which Brock Fredin/"Baron Tharson" accuses CityPages of defamation & wants judges who've granted restraining orders against him removed:

From: Baron Tharson <baron.tharson@gmail.com>
o:baron.tharson@gmail.com>>
Date: March 4, 2017 at 11:35:01 AM MST
To: [REDACTED]
Subject: City Pages Article

Remove the story about Brock Fredin. It's highly inaccurate and the reporter did not read the court transcript. Why do you employ reporters who can't even do basic research?

You're setting yourself up for a defamation case. Just remove the article and stop targeting people without full information. It's very irresponsible and that journalist isn't a journalist. He's an idiot. It's enabling stalkers and physical threats to his safety. It's just a huge mostly false smear campaign based on CIVIL restraining orders brought because

Petitioning Robert Vischer
Stop Donating To University St. Thomas Until Enablers
Sanctioned/Removed

UST's law school employs a Judicial Official who has now negligently enabled the sexual assault and harassment of a former UST student. Problem: Street, through negligence, ignored a death threat, and multiple HRO violations subsequently mocking the victim. This ultimately led to... [Learn more](#)

baron tharson  1 supporter

Petitioning Mark Dayton
Remove Incompetent Judicial Officials in Minnesota

Remove Colia Ceisel, James Street, and Elizabeth Clydesdale from the Ramsey County family court. These referees enable and endorse revenge porn sexual solicitation. I have tirelessly attempted to protect myself against the ongoing harassment and revenge porn brought on by an... [Learn more](#)

baron tharson  1 supporter

Your reporter didn't do any real investigation or even read the court transcripts.

Nothing to write a story about. I'm ashamed your organization City Pages would target [REDACTED].

I require a response to this email and justification and plan to remove the article.

9:30 AM - 6 Mar 2017

8 Retweets 16 Likes

[A row of 16 circular profile pictures of various users.]

EXHIBIT 17

CardsAgstHarassment @CardsAgstHrsmt · Mar 21

Replying to @CardsAgstHrsmt

Newspaper posts story about serial harasser Brock Fredin.

He demands it be removed.

They don't.

What happens next...will not surprise you:

The screenshot shows a website with a red header containing the text "dating psychos". Below the header is a navigation bar with links: HOME, BROWSE / SEARCH PSYCHOS, ADD PSYCHO, FAQS, STORE, REMOVALS, and MY ACCOUNT. The main content area has a blue header "Psycho Profile" and a sub-header "Michael Klingensmith". On the left, there are "Previous Psycho" and "Next Psycho" links, along with social sharing icons for Facebook, Twitter, and Email. The profile page lists the following information:

Attribute	Value	Attribute	Value
First Name	Michael	Alias 1	Michael J Klingensmith
Last Name	Klingensmith	Alias 2	Star Tribune CEO
Gender	Male	Alias 3	Michael Klingensmith Star Tribune
Age	65	Website 1	click to view website
Occupation	StarTribune CEO		
City	Minneapolis		
Country	US		

Below the table, there is a paragraph of text:

Participated in an online campaign designed to victim shame a target of revenge porn. Created mostly false news articles designed to attack the credibility of a revenge porn victim. Did not read any court transcripts and published highly inaccurate misleading statements. Participates in false smear campaigns.

On the right side of the profile page, there are two columns of text:

- "This person is mean-spirited, vicious, sloppy, un-american, and now associated with encouraging others to bully targets of revenge porn. This person accepted verbatim the allegations brought by the person likely responsible for coaching the non consensual sexual solicitation (revenge porn). This person endorses this behavior and further perpetuates as a henchman of the feminist totalitarian movement."
- "Supports journalists who lack basic research skill and cannot read court transcripts."
- "Remove this idiot immediately."



EXHIBIT 18



CardsAgstHarassment @CardsAgstHrsmt · Apr 5

TFW you publicly pledge to be "relentless" & "merciless" against women whose repeated message has simply been: do not stalk & harass women.



Brock Fredin

Due to the egregious and misleading smear campaign, I have lost a job and have so far been unable to secure re-employment over the past 4 months. It is my hope that [REDACTED] and [REDACTED] will acknowledge their wrongful actions.

It goes without saying, this is a very serious matter and their public campaign has trashed my career and likely cost me hundreds of thousands of dollars. Additionally, [REDACTED] and Twitter Defamation => [REDACTED] repeatedly retaliated against me [REDACTED]

[sections redacted]

I have exhausted most peaceful lawful options. At this point, I am left with describing how these parties and their supporters have sadly abused or endorsed abuse of the legal system and viciously harmed families and men. I will be relentless and merciless until such time their conduct ceases. I will not stop any lawful/peaceful protest until all defamation ends and lawful apologies are made. I am far stronger than you and will go to any depth to ensure your egregious behavior is publicly documented.